Responses to Comments in Letter 154 from Marty McIntyre, Bellingham Resident

Note: The responses listed below are numbered to correspond to the numbers shown in the right-hand margin of the preceding comment letter.

1. The Draft EIS evaluated toxic emissions using the same dispersion modeling methods as were used for other criteria pollutants. Maximum 24-hour and annual toxic air pollutant concentrations attributable to the proposed facility and comparisons to Washington Department of Ecology standards are shown in Tables 3.1-13 and 3.1-14 of the Draft EIS. The 24-hour maximum and annual predictions are all less than the regulatory limits under all operating scenarios for the proposed facility. In addition, technical staff from the Canadian MELP concluded that toxic emissions from the proposed facility would not exceed established regulatory limits or applicable British Columbia objectives for air toxics (Volume 1, Appendix K, page 13).

2. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project. Therefore, crossing locations A-S6 and A-S15 will not be disturbed.

   Please see Letter 5, Response to Comment 8 regarding acid deposition. Sand and gravel used for the fill pad at S2GF would come from existing, permitted gravel pits. Environmental impacts associated with the gravel source would be addressed as part of the permitting process for the gravel pit, and not under EFSEC jurisdiction.

3. The City of Sumas, as part of its 20-year plan for use of the public water supply, has concluded that the S2GF project would be a good use of industrial water that has not already been allocated for the City or its customers, assuming reasonable growth for each. If this facility is not built, the City of Sumas will likely attempt to find another industrial user (or users) of the water, to provide a tax base and sales revenue, and also to make beneficial use of the water so that the City will not be at risk of losing the right to the water.

4. Fuel oil as a secondary fuel source would be delivered by tanker truck and stored in an onsite tank. At the end of the construction period, the initial filling of the tank would occur, which would require approximately 250 truck trips that would be spread out over 10 to 15 working days. The air quality impact associated with these deliveries would be a minor source of emissions during the delivery period. When the facility is operating, fuel deliveries would be intermittent during the winter months to replace burned fuel. The facility would burn fuel oil no more than 15 days per year. It is anticipated that at peak load no more than four trucks per hour would be required to replenish the fuel supply. The emissions from these vehicle deliveries would be a minor source of pollutants. Accident rates would not be exacerbated as a result of fuel delivery to the facility. Adverse weather conditions may impact the accessibility and safety of local roadways.

5. Vehicle damage resulting from gravel on a roadway would be resolved on an individual basis. Regarding “measurable increases in traffic accidents”, please note that the

discussion on page 3.10-16 also states that "There is no existing methodology that accurately predicts future traffic accident rates." Increasing accident rates with increasing traffic is a general assumption. The volume of traffic associated with the operations phase of the project would be relatively small and, thus, is not anticipated to result in an increased traffic accident rate. However, during the 90-day period during construction when the site would be filled and graded, there would be a considerable increase in dump truck traffic to and from the site. Similarly, there would be a considerable increase in tanker truck traffic to and from the site during chance occasions in winter when the plant firing was switched to diesel fuel (e.g., in the event of a natural gas curtailment), necessitating repeated refilling of the diesel storage tank. With these temporary increases in traffic, it is expected that there would be a potential increase in traffic accident rates, although these rates cannot be accurately predicted.

6. See Letter 5, Response to Comment 6.

7. Please see Letter 152, Response to Comment 1 for discussion of the role of EFSEC.

8. Jones & Stokes has been preparing EISs and other environmental documentation for over three decades. EFSEC retained Jones & Stokes to perform an independent review of the Application for Site Certification and other documents that were prepared by the applicant's consultant, Dames & Moore. Jones & Stokes then prepared the EIS for the project. Jones & Stokes is not under contract to the applicant.

9. Please see Letter 3, Response to Comment 2 for a discussion of air quality standards and their relation to human health considerations. Please see Letter 154, Response to Comment 1 (above) for a discussion of potential impacts related to toxic air pollutants.

10. The fill material for construction of this plant would be obtained from existing, permitted gravel pits. The environmental impacts of that mining would be addressed in the permitting process for the gravel extraction operations, and not under EFSEC jurisdiction.

11. Fill for the S2GF plant site would be obtained from existing sand and gravel pits. The Washington Department of Fish and Wildlife (WDFW) regulates all activities that result in changes to the bed or banks of waters of the state through administration of the Hydraulic Code Rules (WAC 220-110). In-stream gravel mining, while common in the past, is much less common today, due in part to the strict conditions under which WDFW allows this type of activity.

12. As stated in the EIS Section 3.10, fill for the S2GF plant site would be obtained from three existing sand and gravel pits: Romberg, Agwest, and Nooksack. These are active, permitted sand and gravel pits. The amount of material to be provided from each pit has not been determined at this time. Consequently, the change in pit dimensions related to providing fill to the S2GF site cannot be determined.

13. The material would come from active and permitted sand and gravel pits.

14. Please see Letter 5, Response to Comment 9 and Letter 107, Response to Comment 22 for a discussion of potential noise impacts related to the proposed project.

15. The 115 kV power lines that run through Whatcom County are no longer part of the project. Only the 230 kV line to Canada is included in the project. Therefore, potential human health impacts of the 115 kV lines would not occur.

16. See Letter 154, Response to Comment 15 (above). Modern designs for transmission lines effectively eliminate concerns regarding avian electrocution, by incorporating features such as armless poles, vertical separation of wires, or line insulators.

17. See Letter 154, Response to Comment 15 (above).

18. Per Item 6, Public Roads, of the Partial Stipulation Agreement between City of Sumas and SE2 (included in Volume 1, Appendix G), SE2 has agreed to repair any damage to the roads resulting from SE2's construction-related traffic.

19. Increases in tanker truck traffic would be noticed along whatever route of travel is selected. This would depend on the location of the source of the diesel. The facility would burn diesel no more than 15 days per year. The worst anticipated condition for fuel-oil firing would be five days per month in December, January, and February, based on cold snaps.

20. Comment noted.

21. As shown in Figure 3.10-6 of the EIS, during facility operation, the maximum truck volume would be four trucks per hour during a 12-hour workday for up to two days. This equates to 48 truck trips per day and is a worst-case condition. In comparison, the initial filling of the tank would be spread out over 10 to 15 days and result in an average of one truck per hour delivering diesel. Adverse weather conditions may impact the accessibility and safety of local roadways.

22. Governor Locke's letter vetoing the proposed tax package is included in Volume 1, Appendix H.

23. Thank you for your comment.